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OMB NO. 1124-0005; Expires February 28, 2014

U.S. Department of Justice

Washington, DC 20530

Short Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at http://www.fara.gov.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: http://www.fara.gov. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: http://www.fara.gov.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .429 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

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Name Stephen Heifetz	2. Registration No.
3. Residence Address(es) 539 Beall Avenue Rockville, MD 20850, USA	4. Business Address(es) Steptoe & Johnson LLP 1330 Connecticut Ave., NW, Washington, DC 20036
5. Year of Birth 1971 Nationality USA Present Citizenship USA	If present citizenship was not acquired by birth, indicate when, and how acquired. N/A
7. Occupation Attorney	
8. What is the name and address of the primary registrant? Name Steptoe & Johnson LLP	Address 1330 Connecticut Ave., NW, Washington, DC 20036
9. Indicate your connection with the primary registrant: Description	☐ employee ☐ consultant
☐ officer ☐ associate ☐ other (specify)	agent subcontractor
10. List every foreign principal to whom you will render service Puntland State of Somalia	es in support of the primary registrant.
	I render to the foreign principal(s) listed in Item 10 either directly, or (s) of such services. (If space is insufficient, a full insert page must be
Interface with the U.S. Government on security matters	

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12.	Do any of the above described services inclu	ude political activity as defined in Section 1(o) o	f the Act and in the footnote below?		
	Yes 🗵 No 🗌				
•	If yes, describe separately and in detail such political activity.				
	Advance collaborative relationship with U.s in the Puntland region.	S. government to address piracy and other secu	urity issues and to enhance stability		
13.	The services described in Items 11 and 12 ar	re to be rendered on a			
10.	full time basis	part time basis	☐ special basis		
14.	14. What compensation or thing of value have you received to date or will you receive for the above services?				
	☐ Salary: Amount \$ pe	er Commission at	% of		
	☐ Salary: Not based solely on services rendered to the foreign principal(s).				
	Fee: Amount \$ 0	☐ Other thing of value			
			•		
•	connection with any election to political office and idates for any political office? Yes If yes, furnish the following information:	ice or in connection with any primary election, c s □ No 図	onvention, or caucus held to select		
	Date Amount or Thing of Value	Political Organization or Candidate	Location of Event		
		•			
			•		
		•			
•					
		EXECUTION			
info		igned swears or affirms under penalty of perjury and that he/she is familiar with the contents the her knowledge and belief.			
	December 01, 2011	/s/ Stephen Heifetz	eSigned		
	(Date of signature)	(Signal	ture)		

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.